

INNOVA CAPTAB LIMITED

POLICY OF ARCHIVAL

<i>Approving Authority</i>	<i>Board of Directors of the Company</i>
<i>Initial Version</i>	<i>(Version 1) & 19th June 2022</i>
<i>Revised Version & date</i>	<i>(Version 2) & 25th January 2024 (Version 3) & 29th March 2024</i>

1. BACKGROUND

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the website of Innova Captab Limited (the "Company") for a minimum period of five years and thereafter as per the archival policy of the Company.

This policy has been approved by Board of Directors at its meeting held on 19th June, 2022 and amended on Board Meeting held on 29th March 2024.

2. PURPOSE

The object is to ensure the preservation and availability of the documents of the Company after their required regulatory preservation period, for any legal, administrative, and historical purposes, in respect of documents which are hosted on the website of the Company.

3. DEFINITIONS

"**Applicable laws**" means securities laws defined under the Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

"**Archival**" means accumulation/storage of historical records on server/network or at a physical place.

"**Board**" means Board of Directors of the Company as constituted from time to time. "**Company**" means Innova Captab Limited.

"**Company Secretary and Compliance Officer**" means the Company Secretary and Compliance Officer appointed by the Board.

"**Documents**" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

"**Managing Director**" means the Managing Director appointed by the Board and the Shareholders of the Company under the Companies Act, 2013.

"**Policy**" means Company's policy on archival of the disclosures made on its website, of information and events communicated to stock exchanges by the Company.

"**SEBI Listing Regulations**" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

Words and expressions used and not defined in this Board Archival Policy shall have the meaning ascribed to them in the SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, as amended, the Securities Contracts (Regulation) Act, 1956, as amended, the Depositories Act, 1996, as amended, or the Companies Act 2013 and rules and regulations made thereunder.

4. ARCHIVAL PROCESS:

1. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations will be hosted on the website of the Company under the section titled "Investor Relations" for a period of five years and thereafter the same shall be archived to be available for retrieval for such period as may be decided by the Managing Director of the Company.
2. Archival material of the Company shall not be destroyed or purged without the approval of the Compliance Officer. The Compliance Officer means the Company Secretary of the Company who is responsible to perform duties as required under Section 205 of the Companies Act 2013 and Regulation 6 of the SEBI Listing Regulations.
3. The Compliance Officer, in consultation with the Board, will be responsible for deciding how long archival material is to be retained in and under the direct control of the officer concerned, if the law does not specify any time period, the period shall not be less than 3 years.
4. Subsequently, any shareholder of the Company intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company. The Company Secretary shall respond to the request within 30 working days of receiving the request.
5. All Documents generated, disclosed, or received by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company and constitute archival material.
6. Provided that nothing contained herein shall be applicable to accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility, or loss due to any reason, other than deliberate and determinate deletion.
7. Material so selected for preservation shall be sent to the Company archives in the category of such folders as may be specified by the Company.
8. The Documents submitted to the stock exchange, to be hosted on the website for the purpose of compliance with disclosure norms shall also be archived in the following manner:
 - a) Archiving of the Documents to be submitted to the stock exchange, in terms of the Regulations, shall be for 3 years after the lapse of the preservation period of 5 years [as specified in Regulation 30(8)].
 - b) For the Documents to be submitted to the stock exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.

5. REVIEW AND AMENDMENT

1. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes by the Board of Directors of the Company.
2. In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

6. INTERPRETATION

In case of any conflict between the provisions of this policy and the Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

7. COMMUNICATION OF THIS POLICY

This Policy shall also be disclosed on the website of the Company.

8. AMENDMENTS TO THE POLICY

The Company is committed to continuously reviewing and updating our policies and procedures. Therefore, this policy is subject to modification. Any amendment of any provision of this policy shall be carried out by people authorized by the Board in this regard.

The persons authorized by the Board to approve amendment to this policy shall ensure that it is consistent and in compliance with the prevailing provisions of applicable Acts, Rules, Guidelines, Regulations as well as in accordance with administrative / business requirements of the Company.